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December 8, 2023

**VIA ECF**

Judge Kiyo A. Matsumoto  
United States District Court, Eastern District of  
New York 225  
Cadman Plaza East  
Courtroom 6C  
South Brooklyn, New York 11201

**Re: Falls Lake National Insurance Co. v. Kalnitech Constr. Corp. et. al.**  
**Docket No: 1:22-cv-01473-KAM-PK**  
**Our File #: 28464-22**

Hon. Judge Matsumoto:

This office represents defendant KALNITECH CONSTRUCTION CORP. ("Kalnitech") in the above-referenced action.

While preparing a courtesy copy of Kalnitech 's L.R. 56.1 Counterstatement of Material Facts [Doc. No. 66], it came to my attention that certain exhibits cited therein, already a part of the Court's docket as Exhibits to Plaintiff's L.R. 56.1 Statement of Material Facts at Document No. 64, were not attached to Kalnitech's Counterstatement, as required by the Part Rules, due to filing error.

I write this letter to formally request leave for Kalnitech to file the following attachments which, as previously stated, are already part of the Court's docket:

Exhibit A - Espinoza Complaint in First Action

Exhibit B - Dava's Answer in First Action

Exhibit C - Kalnitech's Answer in First Action

Exhibit G - Policy issued by Falls Lake to Kalnitech



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Exhibit M - Kalnitech Master Subcontract

Exhibit O - Espinoza's Response to Plaintiff's First Set of Requests

Exhibit P- Jim Associates Master Subcontract Agreement

Exhibit R - Jim Associate's document Production

Respectfully,

SACCO & FILLAS, LLP

/s/ Shira Biegacz

By: Shira J. Biegacz, Esq.